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*Attorneys for Defendants  
Miguel Sandoval*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RAKIM CADDELL,

Plaintiff,

v.

WILLIAM GITTERE, *et al.*,

Defendants.

Case No. 3:19-cv-00053-MMD-WGC

**ORDER GRANTING  
MOTION FOR EXTENSION OF  
DISPOSITIVE MOTION DEADLINE TO  
AUGUST 24, 2020**

Defendant, Miguel Sandoval, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Meredith N. Beresford, Deputy Attorney General, hereby files this Motion for Extension of Dispositive Motion Deadline to August 24, 2020. This motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. ARGUMENT**

Defendants respectfully request an extension of time to August 24, 2020 to file dispositive motions from the current deadline of August 5, 2020, set forth in the Court's Scheduling Order dated April 7, 2020 (ECF No. 19). Attached as Exhibit A is a stipulation with Counsel for Plaintiff to extend the deadline to August 24, 2020. Counsel for Plaintiff is new to the case. and both parties would like an opportunity to discuss settlement prior to the dispositive motion deadline. Further, this request has been necessitated by recent quarantine measures imposed in response to the COVID-19 virus pandemic. Namely, Governor Sisolak issued a "stay at home" directive on April 1, 2020, whereby Deputy

1 Attorneys General and other staff are required to utilized home-based working arrangements. As a  
2 result, the already limited staff ate the Office of the Attorney General is rendered less efficient due to  
3 constraints imposed by limited Virtual Private Networks (VPN) and lack of remote document access.

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:  
5 When an act may or must be done within a specified time, the court may, for good cause, extend the  
6 time: (A) with or without motion or notice fi the court acts, or if a request is made, before the original  
7 time or its extension expires; or (B) on motion made after the time has expired if the party failed to act  
8 because of excusable neglect.

9 The requested extension of time should afford Defendants adequate time to prepare and file a  
10 motion for summary judgment in this case as well as engage in good faith settlement negotiations with  
11 Plaintiff.

12 For these reasons, Defendants respectfully request a 19-day extension of time from the current  
13 deadline to file a motion for summary judgment in this case, with a new deadline to and including  
14 Monday, **August 24, 2020**. Likewise, Defendants respectfully request that the Court revise the deadline  
15 for the joint pretrial order to be modified accordingly as set forth below.

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**Schedule for Remaining Deadlines**

Dispositive motion deadline **August 24, 2020**

Joint pretrial order (if no dispositive motions pending)\* **September 23, 2020**

\*Or 30 days after the decision of any pending dispositive motions.

DATED this 5th day of August, 2020.

AARON D. FORD

Attorney General

By: /s/Meredith N. Beresford  
MEREDITH N. BERESFORD, Bar No. 13308  
Deputy Attorney General

*Attorneys for Defendants*

**IT IS SO ORDERED.**

William G. Cobb  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** August 6, 2020

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*Attorneys for Defendants*  
*Miguel Sandoval*

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**STIPULATION TO CONTINUE DEADLINE  
FOR MOTION FOR SUMMARY  
JUDGMENT TO AUGUST 24, 2020**

Defendant, Miguel Sandoval, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Meredith N. Beresford, Deputy Attorney General, and Rakim Caddell, by and through counsel, Craig Mueller, hereby stipulate to continue the Motion for Summary Judgment deadline from August 5, 2020 to August 24, 2020.

DATED this 5th day of August, 2020.

AARON D. FORD  
Attorney General

By: /s/ Meredith N. Beresford  
MEREDITH N. BERESFORD,  
Bar No. 13308  
Deputy Attorney General

*Attorneys for Defendants*

By:

  
CRAIG MUELLER,  
Bar No. 4703

*Attorney for Plaintiff*